

REMARKS

The Office Action dated February 3, 2009 has been received and carefully noted. The above amendments to the claims, and the following remarks, are submitted as a full and complete response thereto.

Claims 1, 13, 14, 17, 18, 25-41, 43, and 44 have been amended to more particularly point out and distinctly claim the subject matter of the invention. No new matter is believed to have been added. Claims 1-41, 43, and 44 are currently pending and are respectfully submitted for consideration.

Applicants respectfully thank the Examiner for the allowance of claims 1-24, 35-38, 43, and 44.

Reconsideration and withdrawal of the rejections is respectfully requested in light of the following remarks.

Claims 25-34 and 39-41 were rejected under 35 U.S.C. § 103(a) as being unpatentable over Aviani, Jr. et al. (U.S. Patent Publication No. 2006/0117093) in view of Wittenberg et al. (U.S. Patent Publication No. 2005/0078668). Particularly, the Office Action asserted that the combination of Aviani, Jr. et al. and Wittenberg et al. disclosed all of the elements of claims 25-34 and 39-41. However, this assertion by the Office Action is respectfully traversed as followed.

Claim 25 recites an apparatus. The apparatus includes a receiving means for receiving a service request from a service request input node. The apparatus includes a

look-up means for performing, based on a received service request, a look-up in a database for obtaining destination information required for forwarding the service request to a destination. The apparatus includes a sending means for sending the destination information from the apparatus to the service request input node. The service request input node is configured to forward the service request, based on the received destination information, from the service request input node to the destination. The service request is forwarded to an entry node of the domain for relaying the service request to another domain when the service request is destined for a user terminal not associated with the service nodes of the domain.

Claim 27, upon which claim 28 is dependent, recites an apparatus. The apparatus includes an intermediate node configured to receive a service request from a service request input node. The intermediate node is further configured to obtain based on a received service request destination information for forwarding the service request to a destination. The intermediate node is configured to send the destination information from the intermediate node to the service request input node. The intermediate node is also configured to forward the service request based on the received destination information from the service request input node to the destination. The service request is forwarded to an entry node of the domain for relaying the service request to another domain when the service request is destined for a user terminal not associated with the service nodes of the domain.

Claim 29, upon which claims 32 and 33 are dependent, recites an apparatus. The apparatus includes a redirecting control means for controlling a redirecting of a received incoming service request. The apparatus includes a transmitting means for transmitting the received incoming service request to an intermediate node for obtaining destination information required for forwarding a service request to a destination. The apparatus includes a determining means for determining when the received incoming service request from within the domain is destined for a user terminal not associated with the service nodes of the domain. The apparatus includes a forwarding means for forwarding the service request, based on the received destination information, from the apparatus to the destination. The service request is forwarded to an entry node of the domain for relaying the service request to another domain when the determining means determines that the service request is destined for a user terminal not associated with the service nodes of the domain.

Claim 39, upon which claim 26 is dependent, recites an apparatus. The apparatus includes a look-up unit configured to perform, based on a received service request, a look-up in a database for obtaining destination information required for forwarding the service request to a destination. The apparatus includes a sending unit configured to send the destination information from the apparatus to the service request input node. The service request input node is configured to forward the service request, based on the received destination information, from the service request input node to the destination.

The service request is forwarded to an entry node of the domain for relaying the service request to another domain when the service request is destined for a user terminal not associated with the service nodes of the domain.

Claim 40, upon which claims 30, 31, 34, and 41 are dependent, recites an apparatus. The apparatus includes a redirecting control unit configured to control a redirecting of a received incoming service request. The apparatus includes a transmitting unit configured to transmit the received incoming service request to an intermediate node for obtaining destination information required for forwarding a service request to a destination. The apparatus includes a determining unit configured to determine whether the received incoming service request from within the domain is destined for a user terminal not associated with the service node of the domain. The apparatus includes a forwarding unit configured to forward the service request, based on the received destination information, from the apparatus to the destination. The service request is forwarded to an entry node of the domain for relaying the service request to another domain when the determining unit determines that the service request is destined for a user terminal not associated with a service node of the domain.

As will be discussed below, Applicants respectfully submit that the combination of Aviani, Jr. et al. and Wittenberg et al. fails to disclose, either expressly or implicitly, all of the elements of the claims, and therefore fails to provide the advantages and features as discussed above.

Aviani, Jr. et al. discusses a method and apparatus to redirect network cache traffic. Specifically, Aviani, Jr. et al. discusses methods and apparatus to enable a caching system to recognize data requests headed for destination servers, which require real client access, and to pass the request without engaging in the standard caching protocol. Aviani, Jr. et al., paragraph [0012].

However, in claim 25, a service request is received from a service request input node. Based on the received service request, a look-up is performed in a database to obtain destination information required to forward the service request to a destination. See, e.g., claim 25, lines 5-8.

The cited document, i.e., Aviani, Jr. et al. does not disclose, either expressly or implicitly, at least the above-mentioned features of claim 25. Rather, according to Aviani, Jr. et al., a source or client platform transmits a data request to a destination platform. Aviani, Jr. et al., paragraph [0033]. The request is received by a cache-enabled router, which routes particular requests to an associated cache and redirects the request to its associated cache. *Id.*

The cache then determines whether the requested content is currently resided in the cache. Aviani, Jr. et al., paragraph [0034]. Because the destination platform requires user authentication, the requested content is determined not to be in the cache. *Id.* This results in the cache to attempt to open its own connection to the destination platform by which the request may be transmitted. *Id.* Because the destination platform requires user

authentication, the connection is rejected and the cache is notified of the failed connection. This causes the cache to create an entry of the original client/destination platform to be made in a bypass list. Aviani, Jr. et al., paragraph [0036]. The bypass lists will now contain an entry of the original client/destination platform so the request may pass through the caching system without determining whether the requested data is in the cache. As a result, the cache may send a message instruction to the original client instructing the original client to retransmit again. Aviani, Jr. et al., paragraph [0037]. The original client will retransmit the original request to the same destination. Upon reception of the new request by the same caching system, the original client/destination platform are identified and compared to the resident bypass list. Aviani, Jr. et al., paragraph [0038]. Finally, upon comparison of the original client/destination platform are identified and compared to the resident bypass list, the request is transmitted to the destination platform.

In other words, when a client sends a request to a destination in Aviani, Jr. et al., the caching system will create a bypass list to bypass authentication of the client. This is different from what is being recited in claim 25. In claim 25, a “look-up means...perform[s], based on a received service request, a look-up in a database for obtaining destination information required for forwarding said service request to a destination”.

Specifically, Aviani, Jr. et al. cannot disclose, either expressly or implicitly, “performing...a look-up for obtaining a destination information”, as recited in claim 25. This is not a surprise, because the destination is already known in Aviani, Jr. et al. See, e.g., Aviani, Jr. et al, paragraph [0033] (“a source or client platform...transmits the data request to the destination platform...”).

Furthermore, the bypass list in Aviani, Jr. et al. does not constitute the “database” of claim 25, because the bypass list in Aviani, Jr. et al. is simply used to allow the request to pass through the caching system without determining whether the requested data is in the cache. Therefore, it is rather apparent that the bypass list of Aviani, Jr. et al. is not used to perform a look-up to obtain destination information required to forward the service request to a destination, as in claim 25. In fact, there is no need in Aviani, Jr. et al. to obtain the destination information, as the destination in Aviani, Jr. et al. is already known.

Therefore, a person of ordinary skill in the art would not rely on Aviani, Jr. et al. to disclose, either expressly or implicitly, at least, “look-up means for performing, based on a received service request, a look-up in a database for obtaining destination information required for forwarding said service request to a destination”, as recited in claim 25.

Wittenberg et al., which discusses a network element having a redirect server, fails to cure the deficiencies of Aviani, Jr. et al., as discussed above with respect to claim 25.

In addition to the failure of Wittenberg et al. to cure the above-mentioned deficiencies of Aviani, Jr. et al., Wittenberg et al. also fails to cure the deficiencies of Aviani, Jr. et al., which were relied upon in the Office Action. In the Office Action, it was asserted that Aviani, Jr. et al. does not disclose

sending means for sending said destination information from the intermediate node to said service request input node, wherein said service request input node is configured to forward said service request, based on said received destination information, from the service request input node to said destination, comprising forwarding said service request to an entry node of said domain for relaying said service request to another domain when said service request is destined for a user terminal not associated with the service nodes of said domain

as recited in claim 25. See, e.g., Office Action, page 3, lines 6-7. It was also asserted, in the Office Action, that Wittenberg et al. discloses the above-mentioned deficiencies of Aviani, Jr. et al. See, e.g., page 3, lines 7-13. However, a review of Wittenberg et al. reveals that the position taken in the Office Action is clearly incorrect.

Fig. 2 of Wittenberg et al. illustrates a configuration used to redirect packets. According to Wittenberg et al., a network element accesses one or more routing policies to determine whether the request should be redirected to another destination when the network element receives a request from one of the computing devices. Wittenberg et al., paragraph [0029]. If it is determined that the packet should be redirected, based on the routing policies, the packet is forward to a redirect server. Wittenberg et al., paragraph [0029]. Once the redirect server receives the packet, the redirect server examines the packet and determines the redirect address and returns the redirect address in a reply

packet to cause the redirection. *Id.* The redirect address is then forwarded back to the browser of the computing device. *Id.* The browser of the computing device then accesses the redirect destination, via the network element again, using the redirect address. *Id.*

In other words, when the computing device of Wittenberg et al. requests to access one of the services, the network element and the redirect server determine whether the packet should be redirected. If the packet of Wittenberg et al. should be redirected, then the server forwards the redirect address to the computing device so the computing device can access one of the services provided by the internet service providers.

However, Wittenberg et al. fails to disclose, either expressly or implicitly, at least, that “said destination information...[is sent] to said service request input node...[so] said service request input node...[can] forward said service request, based on said received destination information,...to said destination”, as recited in claim 25. This is not surprising, as the request in Wittenberg et al. is not being forward to the destination, but instead, according to Wittenberg et al., a redirect address is being transmitted back to the computing device from the redirect server so the computing device can access the services of the internet service provider.

Furthermore, a review of Wittenberg et al., reveals that this document is completely silent as to “said service request [is being forward] to an entry node of said domain for relaying said service request to another domain when said service request is

destined for a user terminal not associated with the service nodes of said domain”, as recited in claim 25. This silence is not surprising, since the request in Wittenberg et al. to access the services is not being forward to the destination address or entry node, but instead a direct address is being transmitted back to the computing device so the computing device can access the services of the internet service provider.

Therefore, in view of the above, it is readily apparent that Wittenberg et al. fails to cure the deficiencies of Aviani, Jr. et al., as discussed above with respect to claim 25. This failure by Wittenberg et al. to cure the above-mentioned deficiencies of Aviani, Jr. et al. causes the entire combination of Aviani, Jr. et al. and Wittenberg et al. to be deficient.

Due to the failures of Aviani, Jr. et al. and Wittenberg et al. to disclose, either expressly or implicitly, at least, the above-quoted features of claim 25, Applicants respectfully request that the rejection of claim 25 be withdrawn.

Independent claims 27, 29, 39 and 40, which each have their own scope, recite features similar to those recited in claim 25. Therefore, Applicants respectfully request that the rejection of independent claims 27, 29, 39, and 40 be withdrawn for reasons similar to those discussed above with respect to claim 25.

Applicants respectfully submit that dependent claims 28, 30-34, and 41 inherit the patentable features of their respective base claims, by virtue of their dependency. Accordingly, Applicants respectfully request that the rejection of dependent claims 28,

30-34, and 41 be withdrawn for at least the same reasons as their respective base claims, from which they depend upon, and for the specific limitations recited therein.

For at least the reasons discussed above, Applicants respectfully submit that none of the cited references, whether considered alone or in combination, disclose, either expressly, implicitly or inherently, all of the elements of the claimed invention. These distinctions are more than sufficient to render the claimed invention unanticipated and unobvious. It is therefore respectfully requested that all of claims 1-41, 43, and 44 be allowed, and this application passed to issue.

If for any reason the Examiner determines that the application is not now in condition for allowance, it is respectfully requested that the Examiner contact, by telephone, the applicants' undersigned attorney at the indicated telephone number to arrange for an interview to expedite the disposition of this application.

In the event this paper is not being timely filed, the applicants respectfully petition for an appropriate extension of time. Any fees for such an extension together with any additional fees may be charged to Counsel's Deposit Account 50-2222.

Respectfully submitted,



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